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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 JENNIFER KUKLOCK,

14 Plaintiff,

15 v.

16 STATE OF NEVADA, ex rel. its
17 DEPARTMENT OF TRANSPORTATION,

18 Defendant.

Case No.: 3:19-cv-00369-LRH-CLB

19 AMENDED STIPULATED DISCOVERY
20 PLAN

21 SPECIAL SCHEDULING REVIEW
22 REQUESTED

23 The parties' counsel held the FED. R. CIV. P. 26(f) meeting on August 29, 2019 and met and
24 conferred on November 18, 2019 regarding extending the deadlines in the original scheduling order.
25 The parties, by and through their respective undersigned counsel jointly submit the following amended
26 stipulated discovery plan and scheduling order, pursuant to LR 26-1.

27 Amended Discovery Plan and Schedule

28 **Date first defendant answered or otherwise appeared:** July 30, 2019.

Initial Disclosures: Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 26-1(a),
the parties submitted their initial disclosures on or about September 12, 2019.

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The parties are engaged in efforts at early resolution, but if such efforts fail, the parties anticipate additional time for discovery will be required. The current deadline for expert disclosures is December 2, 2019, but the parties have not deposed any witnesses and have responded to the first round of written discovery. Over 1000 pages of documents have been produced. Additionally, the state administrative process for contracting with expert witnesses takes a minimum of 30 days. NDOT has begun this process but will need more time. Additionally, NDOT anticipates noticing depositions of multiple witnesses, and with the holidays approaching, scheduling is likely to be challenging. NDOT respectfully requests a six-month extension of previously agreed upon deadlines, starting with the deadline for expert disclosures. In light of the state's administrative process related to retaining experts, NDOT requests that the deadline for rebuttal experts be 60 days after the initial disclosure of experts. Plaintiff does not object to NDOT's proposed amendments to the scheduling order.

The parties propose the following changes to the original discovery plan (ECF No. 12):

Description	Original Deadline	Proposed Deadline
Discovery Cut-Off Date	Monday, January 27, 2020	Monday, July 27, 2020
Deadline to Amend Pleadings and Add Parties	Tuesday, October 29, 2019	Tuesday, October 29, 2019
Deadline to Disclose Experts	Monday, December 2, 2019	Monday, May 4, 2020
Deadline to Disclose Rebuttal Expert Disclosures	Thursday, January 2, 2019	Wednesday, July 8, 2020
Deadline to File Dispositive Motions	Wednesday, February 26, 2020	Monday, August 27, 2020
Pretrial Order and Pretrial Disclosures	Friday, March 27, 2020 or 30 days after decision on dispositive motions	Monday, September 28, 2020 or 30 days after decision on dispositive motions

Alternative Dispute Resolution: The parties certify that they have met and conferred about the possibility of using alternative dispute-resolution processes including mediation, arbitration, and if applicable, early neutral evaluation. The parties participated in an early neutral evaluation on November 7, 2019.

1 **Alternative Forms of Case Disposition:** The parties certify that they have considered consent
2 to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short
3 Trial Program (General Order 2013-01), but have declined to use those procedures.

4 **Electronic Evidence:** The parties certify that they have discussed whether they intend to
5 present evidence in electronic format. Should this case proceed to trial, the Parties anticipate presenting
6 evidence in electronic form to the jurors. The parties will consult with the courtroom administration to
7 ensure that presentation material is compatible with the court's systems.

8 DATED this 20th of November, 2019.

DATED this 20 of November, 2019.

10 BENSON LAW, LLC

AARON D. FORD
Attorney General

11 By: 

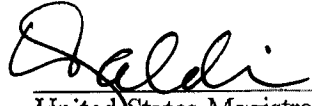
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19 **ORDER**

20 **IT IS SO ORDERED.**

21 
22 United States Magistrate Judge

23 Dated: 11/25/2019
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